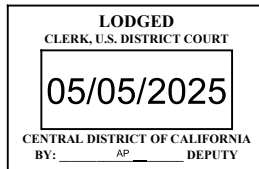


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UNITED STATES OF AMERICA



10 UNITED STATES DISTRICT COURT

11 FOR THE CENTRAL DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 JESUS AGUILAR GARCIA,

16 Defendant.  
17  
18

Case No. 5:25-mj-00271

GOVERNMENT'S NOTICE OF REQUEST  
FOR DETENTION

19 Plaintiff, United States of America, by and through its  
20 counsel of record, hereby requests detention of defendant and gives  
21 notice of the following material factors:

22 X 1. Temporary 10-day Detention Requested (§ 3142(d)) on the  
23 following grounds:

24 \_\_\_\_\_ a. present offense committed while defendant was on  
25 release pending (felony trial), (sentencing),  
26 (appeal), or on (probation) (parole); or

27 X b. defendant is an alien not lawfully admitted for  
28 permanent residence; and

1          X   c. defendant may flee; or

2          X   d. pose a danger to another or the community.

3          X   2. Pretrial Detention Requested (§ 3142(e)) because no  
4                condition or combination of conditions will reasonably  
5                assure:

6                  X   a. the appearance of the defendant as required;

7                  X   b. safety of any other person and the community.

8        \_\_\_\_\_ 3. Detention Requested Pending Supervised Release/Probation  
9                Revocation Hearing (Rules 32.1(a)(6), 46(d), and 18  
10                U.S.C. § 3143(a)):

11                \_\_\_\_\_ a. defendant cannot establish by clear and convincing  
12                        evidence that he/she will not pose a danger to any  
13                        other person or to the community;

14                \_\_\_\_\_ b. defendant cannot establish by clear and convincing  
15                        evidence that he/she will not flee.

16        \_\_\_\_\_ 4. Presumptions Applicable to Pretrial Detention (18 U.S.C.  
17                § 3142(e)):

18                \_\_\_\_\_ a. Title 21 or Maritime Drug Law Enforcement Act  
19                        ("MDLEA") (46 U.S.C. App. 1901 et seq.) offense with  
20                        10-year or greater maximum penalty (presumption of  
21                        danger to community and flight risk);

22                \_\_\_\_\_ b. offense under 18 U.S.C. §§ 924(c), 956(a), 2332b, or  
23                        2332b(g)(5)(B) with 10-year or greater maximum  
24                        penalty (presumption of danger to community and  
25                        flight risk);

26                \_\_\_\_\_ c. offense involving a minor victim under 18 U.S.C. §§  
27                        1201, 1591, 2241, 2242, 2244(a)(1), 2245, 2251,  
28                        2251A, 2252(a)(1)-(a)(3), 2252A(a)(1)-2252A(a)(4),

2260, 2421, 2422, 2423 or 2425 (presumption of danger to community and flight risk);

\_\_\_\_\_ d. defendant currently charged with an offense described in paragraph 5a - 5e below, AND defendant was previously convicted of an offense described in paragraph 5a - 5e below (whether Federal or State/local), AND that previous offense was committed while defendant was on release pending trial, AND the current offense was committed within five years of conviction or release from prison on the above-described previous conviction (presumption of danger to community).

X 5. Government Is Entitled to Detention Hearing Under § 3142(f) If the Case Involves:

- \_\_\_\_\_ a. a crime of violence (as defined in 18 U.S.C. § 3156(a)(4)) or Federal crime of terrorism (as defined in 18 U.S.C. § 2332b(g)(5)(B)) for which maximum sentence is 10 years' imprisonment or more;
- \_\_\_\_\_ b. an offense for which maximum sentence is life imprisonment or death;
- \_\_\_\_\_ c. Title 21 or MDLEA offense for which maximum sentence is 10 years' imprisonment or more;

1        \_\_\_\_\_ d. any felony if defendant has two or more convictions  
2                    for a crime set forth in a-c above or for an offense  
3                    under state or local law that would qualify under a,  
4                    b, or c if federal jurisdiction were present, or a  
5                    combination or such offenses;

6        \_\_\_\_\_ e. any felony not otherwise a crime of violence that  
7                    involves a minor victim or the possession or use of  
8                    a firearm or destructive device (as defined in 18  
9                    U.S.C. § 921), or any other dangerous weapon, or  
10                  involves a failure to register under 18 U.S.C. §  
11                  2250;

12          X   f. serious risk defendant will flee;

13        \_\_\_\_\_ g. serious risk defendant will (obstruct or attempt to  
14                    obstruct justice) or (threaten, injure, or  
15                    intimidate prospective witness or juror, or attempt  
16                    to do so).

17        \_\_\_\_\_ 6. Government requests continuance of \_\_\_\_\_ days for  
18                    detention hearing under § 3142(f) and based upon the  
19                    following reason(s):

20                    \_\_\_\_\_  
21                    \_\_\_\_\_  
22                    \_\_\_\_\_  
23                    \_\_\_\_\_

24        //

25        //

26        //

1        7. Good cause for continuance in excess of three days exists  
2        in that:

3        \_\_\_\_\_  
4        \_\_\_\_\_  
5        \_\_\_\_\_  
6        \_\_\_\_\_

8        Dated: May 5, 2025

Respectfully submitted,

9        BILAL A. ESSAYLI  
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13       Chief, Criminal Division

14       PETER DAHLQUIST  
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16       Acting Chief, Riverside Branch Office

17       \_\_\_\_\_ /s/  
18       JOHN A. BALLA  
19       Assistant United States Attorney

20       Attorneys for Plaintiff  
21       UNITED STATES OF AMERICA  
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